

Mr. Walter B. Woodhams
Woodcrest Manufacturing, Inc.
P.O. Box 848
Peru, Indiana 46970

Re: 103-12913
First Administrative Amendment
To Part 70 Permit No: 103-6060-00016

Dear Mr. Woodhams:

Woodcrest Manufacturing, Inc., was issued a Part 70 permit on April 20, 1998 for a stationary wood furniture manufacturing plant. A letter requesting a significant source modification (039-12741) was received on September 20, 2000. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1 (22)]**

The Permittee owns and operates a stationary wood furniture manufacturing plant.

Responsible Official:	Walter B. Woodhams, President
Source Address:	217 East Canal St., Peru, Indiana 46970
Mailing Address:	P.O. Box 848, Peru, Indiana 46970
SIC Code:	2512
County Location:	Miami
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) The following surface coating equipment:

- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.

- (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
 - (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
 - (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
 - (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
 - (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
 - (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.
 - (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
 - (9) **One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.**
 - (10) **One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.**
- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
 - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
 - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.

- (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
 - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
 - (6) **Line C-6, with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.**
- (c) One (1) wood-fired boiler, identified as EU-02, with a heat input capacity of 6.0 million Btu per hour, and exhausting to Stack ID D.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC **and PM** is limited to 246 tons each per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twentyfour (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 41-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.7 Stack Height [326 IAC 1-7] (a)

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) The following surface coating equipment:
- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.
 - (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
 - (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
 - (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
 - (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
 - (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
 - (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.
 - (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
 - (9) **One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.**
 - (10) **One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components, a maximum capacity of 80 units per hour, and the emissions are fugitive.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements for New Facilities), the VOC emissions from the surface coating equipment **EU-01G, EU-01H, EU-01I, EU-01N, EU-01J, EU-01K, EU-01L, and EU-01M** shall be reduced using the best available control technology technology (BACT). Pursuant to PC (52) 1698, BACT is:

- (a) Using air assisted airless spray guns for surface coating.
- (b) That volatile organic compound emissions from the stain shall be limited to 6.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (c) That volatile organic compound emissions from the sealer shall be limited to 5.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (d) That volatile organic compound emissions from the varnish shall be limited to 5.3 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied by emission units EU-01O and EU-01P to wood furniture and cabinets shall utilize one of the following application methods:

**Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application**

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

~~Pursuant to OP-52-06-92-0418, issued on September 6, 1988,~~ **The total of all** surface coating facilities (EU01G, EU-01H, EU-01I, EU-01J, EU-01K, EU-01L, **and EU-01M, EU-01O, and EU-01P**) shall use no more than 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to 246 tons of VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

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- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
 - (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).

A copy of this rule is enclosed.

D.1.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and associated control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63, Subpart JJ]

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- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.
 - (b) If the OAM requests, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. ~~IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

D.1.10 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.54 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.1.11 Particulate Matter (PM)

Pursuant to OP-52-06-92-0118, issued on September 6, 1988, **and in order to comply with D.1.4**, the dry filters for PM control shall be in operation at all times when the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.32, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits and the VOC usage limits established in Conditions D.1.1 and D.1.32.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS)

necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
- (3) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, compliance shall be based on the volume weighted average VOC content of the coatings used for each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D * O * Q / [1 - W * Dc / Dw]]}{33}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, %

Q = quantity of coating, gal/unit

W = percent volume water, %

C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.54, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.54.
- (1) Certified Product Data Sheet for each finishing material and thinner.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for each finishing material and thinner.
 - (3) The VHAP content in weight percent of each thinner used.
 - (4) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.65, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.1244, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- (a) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, a quarterly summary of the information described in Condition D.1. ~~1342~~, (a)(3) to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A quarterly summary of the information to document compliance with Condition D.1. ~~3~~ 2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (c) An Initial Compliance Report to document compliance with Condition D.1. ~~5~~ 4, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of November 21, 1997. The initial compliance report must include data from the entire month that the compliance date falls.
- (d) A semi-annual Continuous Compliance Report to document compliance with Condition D.1. ~~54~~, and the Certification form, shall be submitted to the address listed in Section C General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1, through June 30.
 - (2) July 1, through December 31.
- (e) The reports required in (c) and (d) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch-Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description:

- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
 - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
 - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.
 - (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
 - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
 - (6) **Line C-6, with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

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- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-1 shall not exceed ~~40.4~~ **18.9** pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour, ~~and~~ Line C-2 is operating at a process weight rate of 5146 pounds per hour, **and Line C-6 is operating at a process weight rate of 6304 pounds per hour.**
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-2 shall not exceed 4.82 pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1690 shall not exceed 1.24 pounds per hour when Line C-5 is operating at a process weight rate of 336 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1735

shall not exceed 6.76 pounds per hour when Line 1735 is operating at a process weight rate of 4220 pounds per hour.

- (e) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1689 shall not exceed 7.68 pounds per hour when Line 1689 is operating at a process weight rate of 5100 pounds per hour.
- (f) **Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse BH-1 shall not exceed 8.85 pounds per hour when Line C-6 is operating at a process weight rate of 6304 pounds per hour.**

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Opacity

Pursuant to OP-52-06-92-0118, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

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- (a) Daily visible emission notations of the stack exhausts (BH-1 and BH-2) shall be performed during normal daylight operations when exhausted to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Preventive Maintenance Plan - Failure to Take Proper Steps, shall be considered a violation of this permit.**

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) ~~For multi-compartment units, t~~ The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) Within eight (8) **business** hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) **business** hours of discovery of the failure and shall include a timetable for completion. **Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Responses Steps, shall be considered a violation of this permit.**

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the stack exhausts (BH-1 and BH-2) and the baghouse exhausts (SP-1689, SP-1690, and SP-1735).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing
Source Address: 217 East Canal Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6060-00016
Administrative No.: AAT-103-10252-00016
Facility: Facility-wide
Parameter: VOC emissions
Limit: 246 tons per 12-consecutive month period, rolled on a monthly basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAM has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Eric Goehl, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7891 to speak directly to Mr. Goehl. Questions may also be directed to Duane Van Laningham at IDEM, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

ERG/EG

cc: File - Miami
U.S. EPA, Region V
Miami County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

Woodcrest Manufacturing, Inc.
217 East Canal Street
Peru, Indiana 46970

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T103-6060-00016	
Issued by: Felicia R. George, Assistant Commissioner, Office of Air Management	Issuance Date:

First Significant Permit Modification No. SPM 039-11338-00011 issued on April 20, 2000

First Significant Source Modification No. SSM 103-12741-00016 issued on **(need date)**

First Administrative Amendment No: AA 103-12913-00016	Pages Affected: 2, 3, 4, 5, 6, 6a, 7, 20, 30, 30a, 31, 31a, 32, 33, 34, 35, 36, 36a, 37, 38, 45
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1 (22)]

The Permittee owns and operates a stationary wood furniture manufacturing plant.

Responsible Official: Walter B. Woodhams, President
Source Address: 217 East Canal St., Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
SIC Code: 2512
County Location: Miami
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program Minor Source under PSD Rules
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) The following surface coating equipment:

- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.
- (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
- (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
- (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
- (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
- (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
- (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.

- (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
 - (9) One (1) dip coating tank, identified as EU-01O, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.
 - (10) One (1) dip coating tank, identified as EU-01P, utilizing a dipping application system, coating wood furniture components with a maximum capacity of 80 units per hour, and the emissions are fugitive.
- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
 - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
 - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.
 - (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
 - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
 - (6) Line C-6 with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.
- (c) One (1) wood-fired boiler, identified as EU-02, with a heat input capacity of 6.0 million Btu per hour, and exhausting to Stack ID D.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations

and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC and PM is limited to 246 tons each per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 41-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

C.7 Stack Height [326 IAC 1-7] (a)

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description:

- (a) The following surface coating equipment:
- (1) One (1) rail stain flowcoater, identified as EU-01G, coating wooden rails with a maximum capacity of 52.5 units per hour, and exhausting to Stack ID SVG.
 - (2) One (1) rail spray booth, identified as EU-01H, utilizing an air assisted airless application system, coating wooden rails with a maximum capacity of 52.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVH.
 - (3) One (1) frame stain flowcoater, identified as EU-01I, coating wooden frames with a maximum capacity of 87.5 units per hour, and exhausting to Stack ID SVI.
 - (4) One (1) wipe down area, identified as EU-01N, with a maximum capacity of 87.5 units per hour, and exhausting to general ventilation.
 - (5) One (1) frame sealer spray booth, identified as EU-01J, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVJ.
 - (6) One (1) frame sealer spray booth, identified as EU-01K, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVK.
 - (7) One (1) frame varnish spray booth, identified as EU-01L, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVL.
 - (8) One (1) frame varnish spray booth, identified as EU-01M, utilizing an air assisted airless application system, coating wooden frames with a maximum capacity of 87.5 units per hour, with dry filters as control for particulate matter overspray, and exhausting to Stack ID SVM.
 - (9) One (1) dip coating tank, identified as EU-01O, utilized a dipping application system, coating crate chests with a maximum capacity of 19 units per hour, and exhausting to Stack ID SVN.
 - (10) One (1) dip coating tank, identified as EU-01P, utilized a dipping application system, coating drawer fronts with a maximum capacity of 80 units per hour, and the emissions are fugitive.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements for New Facilities), the VOC emissions from the surface coating equipment EU-01G, EU-01H, EU-01I, EU-01N, EU-01J,

EU-01K, EU-01L, and EU-01M shall be reduced using the best available control technology (BACT). Pursuant to PC (52) 1698, BACT is:

Woodcrest Manufacturing, Inc.
Peru, Indiana
Permit Reviewer: Bryan Sheets

1st Administrative Amendment No: 109-12913-00016
Reviewer: ERG/EG

Page 30a of 46
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- (a) Using air assisted airless spray guns for surface coating.
- (b) That volatile organic compound emissions from the stain shall be limited to 6.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (c) That volatile organic compound emissions from the sealer shall be limited to 5.8 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These emissions shall be averaged on a daily basis.
- (d) That volatile organic compound emissions from the varnish shall be limited to 5.3 pounds per gallon of coating, excluding water, delivered to the applicator for all coatings. These

emissions shall be averaged on a daily basis.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied by emission units EU-01O and EU-01P to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total of all the surface coating facilities (EU01G, EU-01H, EU-01I, EU-01J, EU-01K, EU-01L, EU-01M, EU-01O and EU-01P) shall use no more than 246 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled on a monthly basis. This usage limit is required to limit the potential to emit of VOC to 246 tons of VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of November 21, 1997.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten

percent (10.0%) maximum VHAP content by weight; or

- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
- (D) Use a combination of (A), (B), and (C).

A copy of this rule is enclosed.

D.1.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a

written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and associated control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63, Subpart JJ]

- (a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-2.1.
- (b) If the OAM requests, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer.

D.1.10 HAP Content

Pursuant to 40 CFR 63, Subpart JJ, an Initial Compliance Report must be submitted within sixty (60) calendar days following the compliance date specified in Condition D.1.5 and a Continuous Compliance Demonstration Report must be submitted within thirty (30) days following every six (6) month period, thereafter.

D.1.11 Particulate Matter (PM)

Pursuant to OP-52-06-92-0118, issued on September 6, 1988, and in order to comply with D.1.4, the dry filters for PM control shall be in operation at all times when the five (5) spray booths (EU-01H, EU-01J, EU-01K, EU-01L, and EU-01M) and one (1) wipe down area (EU-01N) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits and the VOC usage limits established in Conditions D.1.1 and D.1.3.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, compliance shall be based on the volume weighted average VOC content of the coatings used for each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D * O * Q / [1 - W * Dc / Dw]]}{33}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, %

Q = quantity of coating, gal/unit

W = percent volume water, %

C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
 - (1) Certified Product Data Sheet for each finishing material and thinner.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for each finishing material and thinner.
 - (3) The VHAP content in weight percent of each thinner used.
 - (4) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

- (a) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used, a quarterly summary of the information described in Condition D.1.13(a)(3) to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (c) An Initial Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within sixty (60) calendar days following the compliance date of November 21, 1997. The initial compliance report must include data from the entire month that the compliance date falls.
- (d) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5, and the Certification form, shall be submitted to the address listed in Section C

General Reporting Requirements of this permit, within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1, through June 30.
- (2) July 1, through December 31.

- (e) The reports required in (c) and (d) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch-Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description:

- (b) Woodworking operations consisting of the following:
- (1) Line C-1, with a maximum capacity of 5100 pounds per hour, which has emissions either controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1, or controlled by one (1) baghouse, identified as BH-2, exhausting to Stack ID BH-2.
 - (2) Line C-2, with a maximum capacity of 5146 pounds per hour, which has emissions controlled by one (1) cyclone, identified as Cyc-1 and one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.
 - (3) Line C-5, with a maximum capacity of 336 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1690, exhausting to general ventilation.
 - (4) Line 1735, with a maximum capacity of 4220 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1735, exhausting to general ventilation.
 - (5) Line 1689, with a maximum capacity of 5100 pounds per hour, which has emissions controlled by one (1) baghouse, identified as SP-1689, exhausting to general ventilation.
 - (6) Line C-6 with a maximum capacity of 6304 pounds per hour, which has emissions controlled by a baghouse located outside the building identified as BH-1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-1 shall not exceed 18.9 pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour, Line C-2 is operating at a process weight rate of 5146 pounds per hour, and Line C-6 is operating at a process weight rate of 6304 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through Stack ID BH-2 shall not exceed 4.82 pounds per hour when Line C-1 is operating at a process weight rate of 5100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1690 shall not exceed 1.24 pounds per hour when Line C-5 is operating at a process weight rate of 336 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1735 shall not exceed 6.76 pounds per hour when Line 1735 is operating at a process weight rate of 4220 pounds per hour.

- (e) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse SP-1689 shall not exceed 7.68 pounds per hour when Line 1689 is operating at a process weight rate of 5100 pounds per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate matter (PM) emission rate from the woodworking facilities exhausting through the baghouse BH-1 shall not exceed 8.85 pounds per hour when Line C-6 is operating at a process weight rate of 6304 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Opacity

Pursuant to OP-52-06-92-0118, visible emissions from the woodworking facilities shall not exceed ten percent (10%) opacity.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts (BH-1 and BH-2) shall be performed during normal daylight operations when exhausted to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Preventive Maintenance Plan - Failure to Take Proper Steps, shall be considered a violation of this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions).

Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Responses Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the stack exhausts (BH-1 and BH-2) and the baghouse exhausts (SP-1689, SP-1690, and SP-1735).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing
Source Address: 217 East Canal Street, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-6060-00016
Administrative No.: AAT-103-10252-00016
Facility: Facility-wide
Parameter: VOC emissions
Limit: 246 tons per 12-consecutive month period, rolled on a monthly basis

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.